



WHIDBEY TELEPHONE COMPANY

MARION F. HENNY
PRESIDENT

October 15, 2002

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Via ECFS Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

***Re: CC Docket No. 94-102
Seventh and Final Quarterly TTY Implementation Report
Broadband PCS Stations KNLG248 and KNLG517***

Dear Ms. Dortch:

Whidbey Telephone Company ("Whidbey") hereby submits its seventh and final quarterly report on implementation of TTY access to 911 over its digital wireless network. Whidbey is filing this report in accordance with instructions set forth in the Commission's Order released June 28, 2002, in CC Docket No. 94-102.¹

Whidbey is the licensee of stations KNLG248 (F Block – Aberdeen, Washington BTA) and KNLG517 (D-Block Port Angeles, Washington BTA) in the Broadband Personal communications Service (PCS).² Whidbey's network was constructed using GSM technology. As noted in previous filings with this Commission, switching and certain other functions for Whidbey's PCS operations are being provided by AT&T Wireless Services, Inc. and/or one or more of its affiliates ("AWS"). AWS advised Whidbey in June of this year that TTY capability on Whidbey's network would need to be delayed for up to three months (until September 30, 2002) due to technical problems encountered with the implementation of switch software containing a TTY solution. Because Whidbey's compliance with Section 20.18(c) was dependent on the successful installation and testing of this software by AWS or its vendor,

¹ See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Calling Systems, Order, CC Docket 94-102 (rel. June 28, 2002). This Order indicated that carriers should continue to file quarterly TTY status reports until their implementation is complete. Order at para. 24.

² When Whidbey submitted its previous wireless TTY implementation reports in this docket, Whidbey was also the licensee of stations KNLG842 (F Block – Bremerton, Washington BTA) and KNLG844 (F Block – Port Angeles, Washington BTA). However, since the filing with the Commission of Whidbey's Sixth TTY implementation Report, Whidbey has transferred those two stations authorizations to Cascade Wireless, LLC. See FCC Form 603 Required Notification, File No. 0000970412, (filed July 22, 2002).

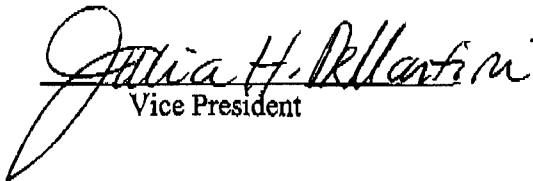
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Whidbey sought a limited waiver of the E911 TTY compatibility requirement until such time as AWS was able to provide this capability to Whidbey.³

Whidbey is pleased to report that the necessary upgrades to its broadband PCS system have been completed and that Whidbey's GSM network is now fully TTY compliant. In this regard, Whidbey respectfully directs the Commission's attention to a letter sent by AWS to the Chief of the Wireless Telecommunications Bureau informing the Commission that AT&T Wireless Services, Inc. had completed the necessary upgrades ahead of schedule.⁴ Whidbey has recently confirmed with AWS staff that TTY capability is now available to mobile phones that access Whidbey's network.

Respectfully submitted,

Whidbey Telephone Company

By: 
Vice President

³ See Whidbey Telephone Company, Request for Limited Waiver, CC Docket No. 94-102 (*filed* June 28, 2002).

⁴ See Letter from Douglas I. Brandon, AT&T Wireless, to Thomas J. Sugrue, Chief, Wireless Telecommunications Bureau, CC Docket No. 94-102, *filed* September 5, 2002.



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September 5, 2002

BY HAND DELIVERY

Thomas J. Sugrue
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *Network Compatibility with Teletypewriters ("TTY")*
CC Docket No. 94-102

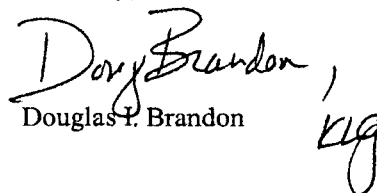
Dear Mr. Sugrue:

I am pleased to report that AT&T Wireless Services, Inc. ("AWS") has completed the necessary upgrades to its GSM network ahead of schedule, and now offers consumers TTY compatibility throughout both of its GSM and TDMA networks nationwide.

As you are aware, Section 20.18(c) of the Commission's rules requires that digital wireless carriers be capable of transmitting 911 calls from individuals using TTYs. Although AWS met the Commission's deadline for our national TDMA network, unforeseen software problems with one of our GSM vendors forced us to seek a limited waiver for specified GSM markets. On June 28, you granted AWS a waiver until September 30, 2002, to allow the vendor to correct the errors and AWS to test and deploy the solution. AWS completed this work on August 28 and is now offering TTY compatibility to all subscribers on the AWS network.

Please accept this letter in lieu of the quarterly status report due later this month from carriers operating under a waiver. Please contact me if you have any questions or require additional information.

Sincerely,


Douglas I. Brandon

cc: Peter Tenhula
Sam Feder
Paul Margie
Bryan Tramont
James D. Schlichting
Catherine Seidel
Barry J. Ohlson
Blaise Scinto
Mindy Littell
Pam Gregory